



AT/Comm

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July 26, 1993

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JUL 27 1993

MAIL BRANCH

Commissioners of the FCC
Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Re: Docket No. 93-61, Rm-8013
In the matter of Best Co. for AT/MS

AT/Comm Incorporated
America's Cup Building
Little Harbor
Marblehead, MA 01945
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Federal Communication Commission
Comments From: AT/Comm, Inc., Marblehead, Massachusetts

Re: Docket No. 93-61, Rm-8013
In the matter of Part 90 for AVMS.

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To The F.C.C. Commission:

MAIL BRANCH

AT/Comm is a leading provider of Electronic Toll and Traffic Management (ETTM) systems. We are a member of the International Bridge, Tunnel, & Turnpike Association and IVHS America. Our ETTM system is currently installed and operating on America's busiest toll net

mobile units is excessive from any perspective. Signals in the adjacent channel should be attenuated to no more than a -90Dbm level measured from a dipole, three meters from a radiating dipole.

- With regard to Narrow-Band Licensing, AT/Comm has great confidence that licensing on a non-exclusive basis will not present a problem if site specifics disallow "competing" licenses within five miles of each other.
- The overall inclination of the NPRM is to encourage high power operations. AT/Comm believes that the rules should encourage and protect low power operators (<20 watts PERP). There is no technical or application reason that ETTM or LMS systems need operate at the levels allowed in the NPRM.

Conclusion:

AT/Comm basically favors the changes suggested by the commission at this time, but only with assurances that operators in adjacent channels, particularly low power operators, will not be interfered with by their "neighbors." AT/Comm reserves its final conclusion on the new rules until such time that the commission has completed its evaluation and is prepared to promulgate the new rules.

Signed:

A handwritten signature in black ink, appearing to be 'JH', written over a horizontal line.

John Hassett
CEO, AT/Comm